

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

SYNOPSYS, INC.,  
a Delaware corporation,

Plaintiff and  
Counter-Defendant,

v.

MAGMA DESIGN AUTOMATION, INC.,  
a Delaware corporation,

Defendant and  
Counter-Claimant.

C.A. No. 05-701-GMS

**NOTICE OF DEPOSITION OF SYNOPSYS, INC.  
PURSUANT TO FED. R. CIV. P. 30(B)(6)**

NOTICE IS HEREBY GIVEN pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure that defendant and counterclaimant Magma Design Automation, Inc. ("Magma") will take the deposition of Synopsys, Inc. ("Synopsys") on Wednesday, June 14, 2006, upon oral examination to be recorded by audio, video and stenographic means.

The deposition will be conducted in the offices of Pooley & Oliver at 3000 El Camino Real, Building 5, 7th Floor, Palo Alto, CA. 94306, before a notary public or other officer authorized by law to administer oaths. The deposition will begin at 9:30 a.m. and continue from day to day until completed.

Pursuant to Fed. R. Civ. P. 30(b)(6), Synopsys, Inc. is required to designate one or more officers, directors, agents, or other persons to testify on its behalf as to the matters set forth in Attachment A.

Dated: June 6, 2006

FISH & RICHARDSON P.C.

By: \_\_\_\_\_

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Attorneys for Defendant and Counter-Claimant  
MAGMA DESIGN AUTOMATION, INC.

### **DEFINITIONS**

1. As used herein, “Synopsys” means Synopsys, Inc., and all predecessors, successors, partnerships and affiliates thereof, all foreign subsidiaries thereof, and all members, managers, agents, employees, attorneys and other persons acting on its behalf.
2. As used herein, “Magma” means Magma Design Automation, Inc., and all predecessors, successors, partnerships and affiliates thereof, all foreign subsidiaries thereof, and all members, managers, agents, employees, attorneys and other persons acting on its behalf.
3. As used herein, “TSMC” means Taiwan Semiconductor Manufacturing Company Ltd., and all predecessors, successors, partnerships and affiliates thereof, all foreign subsidiaries thereof, and all members, managers, agents, employees, attorneys and other persons acting on its behalf.
4. As used herein, “Texas Instruments” means Texas Instruments, Inc., and all predecessors, successors, partnerships and affiliates thereof, all foreign subsidiaries thereof, and all members, managers, agents, employees, attorneys and other persons acting on its behalf.
5. “And” and “or” shall each be construed conjunctively or disjunctively, whichever makes the request more inclusive.
6. “Any” and “all” shall each be construed to mean “each and every,” so as to acquire the broadest meaning possible.
7. The singular form of a word should be interpreted in the plural as well.
8. Any pronoun shall be construed to refer to the masculine, feminine, or neuter gender as in each case is most inclusive.
9. “Communication” means any transmission of information by one or more persons and/or between two or more persons by any means including telephone conversations, letters, telegrams, teletypes, telexes, telecopies, electronic mail, other computer linkups, written memoranda, and face-to-face conversations.
10. As used herein, “relating” (or “relate” or “relates” or “relating” or “related”) to

any given subject means identifying, describing, discussing, concerning, assessing, stating, reflecting, constituting, containing, embodying, tending to support or refute, or referring directly or indirectly to the particular subject matter identified.

11. As used herein, "Present Litigation" refers to the above-captioned action.

12. As used herein, "California Litigation" refers to *Synopsys, Inc. v. Magma Design Automation, Inc.*, C04-03923 MMC, filed in the Northern District of California.

13. The term "and/or" should be construed in the way that makes the request at issue most inclusive.

**ATTACHMENT A**

**SUBJECTS OF TESTIMONY**

1. Any communication (including but not limited to oral, written, or email) between Synopsys and any Magma Customer or between Synopsys and any potential Magma customer, relating to the Present Litigation or the California Litigation.

2. Any communication (including but not limited to oral, written, or email) between Synopsys and TSMC relating to the Present Litigation or the California Litigation, including but not limited to communications from Synopsys employee Robin Yeh during April 2006.

3. Any communication (including but not limited to oral, written, or email) between Synopsys and Texas Instruments relating to the Present Litigation or the California Litigation.

4. Any communication (including but not limited to oral, written, or email) between Synopsys and any Magma customer or between Synopsys and any potential Magma customer, relating to bankruptcy or financial harm to Magma.

5. Any communication (including but not limited to oral, written, or email) between Synopsys and any Magma customer or between Synopsys and any potential Magma customer, relating to whether Synopsys intends to cause bankruptcy or financial harm to Magma in the Present Litigation or the California Litigation.

6. Any communication (including but not limited to oral, written, or email) between Synopsys and TSMC relating to bankruptcy or financial harm to Magma, including but not limited to communications from Synopsys employee Robin Yeh during April 2006.

7. Any communication (including but not limited to oral, written, or email) between Synopsys and Texas Instruments relating to bankruptcy or financial harm to Magma.

**CERTIFICATE OF SERVICE**

I hereby certify that on June 6, 2006, I electronically filed with the Clerk of Court the foregoing **Notice of Deposition of Synopsys, Inc. Pursuant to Fed. R. Civ. P. 30(B)(6)** using CM/ECF which will send electronic notification of such filing(s) to the below-listed following Delaware counsel. In addition, the filing will also be sent via hand delivery to:


Karen Jacobs Loudon, Esquire  
Morris, Nichols, Arsht & Tunnell  
1201 North Market Street  
Wilmington, DE 19801

Attorneys for Plaintiff  
Synopsys, Inc.

I hereby certify that on June 6, 2006, I have mailed by United States Postal Service, the document(s) to the following non-registered participants:

Valerie M. Wagner, Esquire  
Dechert LLP  
1117 California Avenue  
Palo Alto, CA 94304

Attorneys for Plaintiff  
Synopsys, Inc.

  
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William J. Marsden, Jr.